

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Request for Waiver of Section)	WT Docket No. 11-22
27.14(o) to Permit Six Months)	
Additional Time to Demonstrate)	
Substantial Service on EBS)	
Spectrum)	

To: The Commission

**SUPPORTING COMMENTS OF
MID-SOUTH PUBLIC COMMUNICATIONS FOUNDATION**

Mid-South Public Communications Foundation ("Mid-South"), through its attorneys and in response to the Public Notice released February 11, 2011¹ hereby files these comments in support of the "Request for Waiver of Section 27.14(o) to Permit Six Months Additional Time to Demonstrate Substantial Service on EBS Spectrum" ("Request") filed on February 9, 2011 by the National EBS Association ("NEBSA") and the Catholic Television Network ("CTN").

1. Mid-South is the licensee of EBS Station WHR533, Memphis, Tennessee. Mid-South for years has worked with all due diligence with its commercial wireless partner, Clearwire Spectrum Holdings, Inc. ("Clearwire") to develop a wireless system to serve the needs of the Memphis area. Substantial progress has been made. While Mid-South may well meet the Commission's substantial service requirements by May 1, 2011, additional time would provide a welcome cushion in the event of unforeseen complications. In particular, it may

¹ "Wireless Telecommunications Bureau Seeks Comment on Request to Extend the Substantial Service Deadline for Educational Broadband Service Licensees to November 1, 2011, DA 11-281, released February 11, 2011 ("Public Notice").

be noted that the lack of full 4G signal availability has caused some delay in completing the project.

2. Mid-South fully supports the NEBSA/CTN Request. Some of the operational factors preventing full implementation of wireless systems cited by NEBSA and CTN (Request, p. 4) apply to Mid-South. Moreover, as NEBSA and CTN observe (Request, pp. 4-5), practical administrative considerations support a brief extension.² Finally, while a brief extension will well serve the public interest in the development of innovative wireless service making efficient use of EBS spectrum, no party will be prejudiced by grant of the Request.³

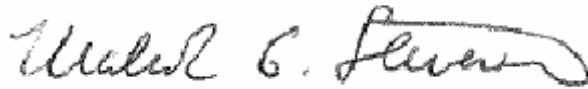
WHEREFORE, for the foregoing reasons, Mid-South respectfully urges the Commission to grant the Request.

Respectfully submitted,

MID-SOUTH PUBLIC COMMUNICATIONS
FOUNDATION

By: _____

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February 22, 2011

² In this regard, many EBS licensees, including Mid-South, await release of a public notice by the Wireless Telecommunications Bureau that will provide key guidance regarding the specific procedures to be followed to demonstrate compliance with the Commission's substantial service requirements.

³ See in this regard, Request, fn. 14.